West Virginia Department of Environmental Protection Division of Air Quality

Fact Sheet



For Final Minor Modification Permitting Action Under 45CSR30 and Title V of the Clean Air Act

This Fact Sheet serves to address the changes specific to this Minor Modification and shall be considered a supplement to the Fact Sheet corresponding with the Title V operating permit issued on October 9, 2015.

Permit Number: **R30-05100127-2015**Application Received: **March 23, 2020**Plant Identification Number: **03-54-051-00127**Permittee: **Williams Ohio Valley Midstream LLC**

Permittee: Williams Ohio Valley Midstream LLC Facility Name: Fort Beeler Gas Processing Plant

Mailing Address: 100 Teletech Drive, Suite 2, Moundsville, WV 26041

Permit Action Number: MM03 Revised: June 23, 2020

Physical Location: Cameron, Marshall County, West Virginia

UTM Coordinates: 535.00 km Easting • 4,414.33 km Northing • Zone 17

Directions: From Main Street in Cameron head north on US-250/Waynesburg Pike

~3.7 miles. Turn left to continue on US-250 ~2.5 miles. Turn left onto

access road ~0.2 mile. Entrance to site is straight ahead.

Facility Description

The **Fort Beeler Gas Processing Plant** currently receives natural gas from local production wells and processes this gas through cryogenic processes, removing natural gas liquids from the inlet gas. The facility has the capacity to process 520 million standard cubic feet per day (mmscfd) of raw natural gas through one (1) 120 mmscfd cryogenic plant (Plant 1), and two (2) 200 mmscfd cryogenic plants (Plant 2 and Plant 3).

The co-located **Groves Dehydration Station** utilizes one 5.0 million standard cubic feet per day (mmscfd) triethylene glyol (TEG) dehydrator. The dehydrator is comprised of a contactor/absorber tower (no vented emissions), a flash tank, and a regenerator/still vent. The dehydrator removes water vapor from the inlet wet gas stream to meet pipeline specifications. Other equipment is: one (1) 0.20 MMBTU/hr glycol (TEG)

reboiler (BLR-01) to supply heat for the TEG regenerator/still vent, as well as several comparatively small tanks with insignificant emissions for glycol and methanol storage.

This modification is to increase the component count of "Process Piping Fugitives" from 24,715 to 25,309 units as increased in permit R13-2826M and to correct the design capacity for the "Pressure Vessels" listed in the emissions units table.

Emissions Summary

This modification results in the following emission changes:

Pollutant	Change in PTE (TPY)
VOC	+ 2.43
Total HAPs	+ 0.69

Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit 157.68 tpy of VOC. Due to this facility's potential to emit over 100 tons per year of a criteria pollutant, Williams Ohio Valley Midstream's Fort Beeler Gas Processing Plant is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

The modification to this facility has been found to be subject to the following applicable rules:

Federal	and	State:			
4500040					

45CSR13	Permits For Construction, Modification, Relocation And Operation Of
	Stationary Sources Of Air Pollutants, Notification Requirements,
	Administrative Updates, Temporary Permits, General Permits, And
	Procedures For Evaluation
45CSR30	Operating permit requirement.

Each State and Federally-enforceable condition of the Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR34 and 45CSR30.

Active Permits/Consent Orders

The active permits/consent orders affected by this modification are as follows:

Permit or	Date of	Permit Determinations or Amendments That
Consent Order Number	Issuance	Affect the Permit (if any)
R13-2826M	April 24, 2020	

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table," which may be downloaded from DAQ's website.

Determinations and Justifications

As a result of this minor modification, the following revisions have been made to the permit in accordance with the requirements of R13-2828M:

1) Section 1.1. Emission Units Table –

- Increased the component count for "FUG" (process piping fugitives) from 24,550 to 25,309.
- Corrected the design capacity for the "Pressure Vessels."
- 2) **Section 1.2.** Updated permit R13-2826M information.
- 3) Conditions 3.1.10., 12.3.1. and 12.4.2. Updated citation of authority.
- 4) **Condition 9.1.5** Revised R13-2826L to R13-2826M

Non-Applicability Determinations

The following requirements have been determined not to be applicable to the subject facility due to the following:

None

Request for Variances or Alternatives

None.

Insignificant Activities

Insignificant emission unit(s) and activities are identified in the Title V application.

Comment Period

Beginning Date: Not Applicable for minor modifications.

Ending Date: N/A

Point of Contact

All written comments should be addressed to the following individual and office:

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West Virginia Department of Environmental Protection
Division of Air Quality
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Charleston, WV 25304

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Procedure for Requesting Public Hearing

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The

Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

Response to Comments (Statement of Basis)

Not applicable.